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May 3, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: *Reporting Requirements for U.S. Providers of International Telecommunications Services, IB Docket No. 04-112*

Joint Petition for Rulemaking to Further Reform the International Settlements Policy, RM-11322

Petition Pursuant to Rule 64.1002(d) Requesting Issuance of Settlements Stop Payment Order on the US-Tonga Route, IB Docket No. 09-10

2010 Biennial Regulatory Review of Regulations Administered by the International Bureau, IB Docket No. 10-268

Dear Ms. Dortch:

On May 2, 2011, Eric Loeb, James Talbot and I met with Louis Peraertz, Legal Advisor to Commissioner Clyburn, in connection with the above-referenced proceedings. During the meeting, AT&T expressed its support for the removal or significant streamlining of the Section 43.61 International Traffic and Section 43.82 Circuit Status Reports, and removal of the International Settlements Policy ("ISP") and its associated filing requirements from the remaining international routes on which this policy still applies.

As part of this discussion, we explained the substantial burdens these outdated reporting requirements place on U.S. international carriers and we described why the collected data no longer provide any meaningful benefit to the Commission in support of the original policy justifications for collecting the data. AT&T expressed its support for measures to streamline the Part 43 international reporting requirements as proposed in the April 2004 Notice of Proposed Rulemaking, in addition to the further streamlining measures proposed by the International Bureau staff in 2006 after discussions with U.S. international carriers, as detailed in the attached handout. In particular, we noted that the quarterly 43.61 reports, which AT&T estimates require approximately 33 hours of work by AT&T personnel per quarter and substantially exceed the estimated response time of two hours listed in the *Federal Register* pursuant to the Paperwork Reduction Act for this report, no longer serve any regulatory purpose and should be eliminated. Similarly, we noted that the reporting of submarine cable circuits in the 43.82 report is unnecessary to calculate regulatory fees following the Commission's 2009 regulatory fee reform. In addition, as a result of the significant expansion of submarine cable capacity since the mid

1990s, and particularly of non-common carrier capacity, circuits reported under Section 43.82 represent only approximately 10% of total U.S. submarine cable capacity. The collection of this limited circuit data provides no basis for competitive analysis and serves no other remaining regulatory purpose.

In regard to the issue of ISP reform, we noted the benefits to U.S. consumers, as demonstrated in the attached chart, from the Commission's 2004 reform of the ISP on routes accounting for 98 percent of U.S. international traffic. We expressed our support for the commencement of a rulemaking to extend these reforms to all U.S. international routes.

In regard to the Settlements Stop Payment Order on the U.S.-Tonga Route, we provided a brief overview of the developments leading up to the disruption of AT&T's circuits on this route, which remain unconnected, and we reiterated AT&T's support for the enforcement of the \$0.19 benchmark rate on U.S.-Tonga calls routed via third countries, as a further remedy.

In response to a request from Mr. Peraertz, we subsequently provided the attached comments filed by AT&T on January 31, 2011 in IB Docket No. 10-268.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez". The signature is fluid and cursive, with a large, stylized "A" and "L".

cc: Louis Peraertz